

# Modern Slavery Policy

## 1.0 Introduction

- 1.1 We are a Community Benefit Society, registered under the Co-operative and Community Benefits Societies Act 2014 and regulated by both the Regulator of Social Housing (RSH) and the Financial Conduct Authority (FCA). We own and manage over 15,000 homes and deliver services to around 30,000 customers across the Tees Valley and North Yorkshire coast, with regional offices in both Redcar and Scarborough and additional facilities in Whitby and Eston.
- 1.2 Our principle activities are the provision of affordable rented accommodation, enabling our customers to live independently in their homes, employability assistance and the development of homes for outright sale and supported housing.
- 1.3 We have an annual turnover of £75m as at 31 March 2021.
- 1.4 The direction and control of our activities is exercised by a Board consisting of 11 Directors, including the Chief Executive as an 'employee'.
- 1.5 Beyond Housing is committed to be accountable, act vigilantly, and with integrity in relation to Section 54 of the Modern Slavery Act 2015.
- 1.6 As an organisation we take a zero-tolerance approach to slavery and human trafficking in our supply chain or in any other part of our organisation.
- 1.7 To ensure compliance to the legal requirements with regard to this Act, Beyond Housing commits to publishing this policy on our website, ensure it's approved by the Board and signed by a director.

1.8 Beyond Housing procures a wide range of goods and services via a diverse and varied supply chain, including:

- Property related services (construction and maintenance)
- Asset management and compliance related services
- Communications and IT equipment services
- Agency staff
- Various professional services
- Office equipment and supplies
- Utilities.

1.9 Beyond Housing primarily engage permanent staff members, however, temporary or seasonal contracts will be sought for short term requirements i.e. sickness cover or for seasonal works such as gardening.

1.10 Our current supply chain comprises c800 companies. These organisations employ a range of contractor, agency, apprentice and full-time staff.

## 2.0 Objective

2.1 Beyond Housing supports activities designed to prevent slavery and human trafficking from existing within the organisation and its supply chain. Beyond Housing are committed to:

- Working collaboratively with our supply chain to eradicate modern slavery
- Identify and manage any key vulnerability that could support slavery
- Strengthen our due diligence processes to further enhance the detection of modern slavery and within our supply chain
- Raise concerns if we believed there were breaches of section 54 of the Modern Slavery Act 2015 with appropriate authorities.

2.2 This policy complements a number of other policies and procedures in our organisation, including our:

- Safeguarding policy
- Procurement policy
- Employee code of conduct
- Recruitment policy.

2.3 Taken together we believe they ensure we have a robust approach to the awareness and prevention of slavery and human trafficking.

2.4 All policies are enforced and managed through supporting procedural documents and are audited through a mix of internal and external audit programmes.

### 3.0 Definitions

3.1 Modern Slavery is the act by which an individual is being exploited or controlled by another individual or group, without the ability to leave.

3.2 An individual is considered in slavery if they are forced to work; through coercion, mental or physical threat; trapped or controlled by an 'employer' through mental or physical abuse, or the threat of abuse, dehumanised and treated as a 'commodity', physically constrained or have restrictions placed on their freedom of movement.

### 4.0 Responsibilities

4.1 The board is responsible for the approval of the Modern Slavery policy.

4.2 It is the Procurement and Performance Manager's and Head of HR's joint responsibility for the implementation and maintenance of this policy.

4.3 It is the responsibility of all Executive Directors, Directors, Heads of Service and managers to ensure the policy is adhered to.

4.4 The Procurement and Performance Manager is responsible for ensuring appropriate procedures and controls exist to ensure that all procurement activity is carried out in accordance with this policy. Non-compliance should be monitored and reported, where appropriate.

4.5 The Director of Customer Services is responsible for ensuring appropriate procedures and controls exist to ensure that all housing management activity is carried out in accordance with this policy. Non-compliance should be monitored and reported, where appropriate to those managers identified in 4.2.

4.6 The Head of HR is responsible for ensuring appropriate procedures and controls exist to ensure that all human resources activity is carried out in accordance with this policy. Non-compliance should be monitored and reported, where appropriate.

4.7 Employees are responsible for complying with the requirements of this policy.

4.8 We will not enter into any business or associate with any organisation knowingly involved in any form of modern slavery or human trafficking.

4.9 A risk-based approach has been adopted assessing the potential risk for slavery and human trafficking within the organisation and our supply chain. This has resulted in three main areas being identified:

- Procurement and supply chain
- Human resources and recruitment
- Housing management – letting of properties and their utilisation.

4.10 **Procurement and supply chain**

4.11 We require a commitment at tender stage to the prevention of slavery from all our suppliers. If a supplier does not have an appropriate policy, we ask them to adopt our own. Failure to do so may lead to a supplier not being approved. This approach forms part of our supplier selection process.

4.12 We have taken the following steps in relation to our supply chain:

- We ask all new suppliers to complete a response at tender stage to establish their business arrangements in terms of modern slavery
- Inclusion of a commitment from our suppliers to align to our modern slavery policy is referenced in our standard terms and conditions
- We intend to share our policy with our suppliers (via our website) and ask that they abide by the principles of the Modern Slavery Act 2015 and commit to ensuring modern slavery is not taking place in their own supply chains.

#### 4.13 **Human resources and recruitment**

4.14 Our HR policies and procedures help prevent unethical employment practices in our organisation. We promote and foster a healthy work-life balance, with wellbeing and employee satisfaction viewed as key priorities. We are also committed to ensuring our employees receive fair remuneration for the job they do, with the support of a job evaluation process and system.

4.15 During the recruitment process various checks are completed, including:

- Proof of eligibility to work in the UK
- Disclosure and barring service for appropriate roles.

#### 4.16 **Housing management**

4.17 All of our customers go through a number of checks prior to being granted a tenancy. These include:

- Right to residency
- Work/economic status
- Tenancy reference checks and three years housing history.

4.18 In addition, subletting is not permitted under the tenancy agreement and all new customers are visited in the first four weeks of any new tenancy.

4.19 We have key partnerships in place with agencies, such as the police and local authorities and strive to work together to share intelligence and, where necessary, take appropriate action to tackle modern slavery.

## 5.0 **Sustainability**

5.1 To ensure a general understanding of modern slavery across the organisation, we have an awareness campaign included within our timetable of company led themed campaigns. The campaign utilises the Home Office marketing materials and research. This will include messages on computer screens, posters displayed in offices and articles to colleagues in our fortnightly briefings.

## 6.0 Reporting

6.1 Whilst we have put in place the above arrangements to minimise the risk that Beyond Housing has any connection to modern slavery and human trafficking, we also have mechanisms colleagues can use to highlight any potential concerns so that we can investigate and take appropriate action. Concerns over modern slavery can be raised via our clear, transparent and accessible 'Something's not right' procedure, available to all colleagues via their line manager or the company intranet.

## 7.0 Consultation

7.1 This policy has been developed to comply with the Modern Slavery Act 2015.

7.2 The Senior Leadership Team, Heads of Service and relevant managers have been consulted in the development of this policy.

## 8.0 Revision

8.1 This policy will be subject to review after one year or in response to changes in legislation or good practice, whichever is the sooner.

Version No	Revision Date	Reason for Revision
Version 3	August 2021	Annual Review to be published on web site
Version 4	23 Aug 2021	Board approved
Version 4	Sep 2021	Published